

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI
SECOND JUDICIAL DISTRICT

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NUMBER 13-0174

JOHN DOE(S) AKA "RANDALL CAJUN"

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: Vaughn Perret
189 Trout Point Road
East Kemptville, NS B0W 1Y0, Canada

NOTICE TO DEFENDANT(S)

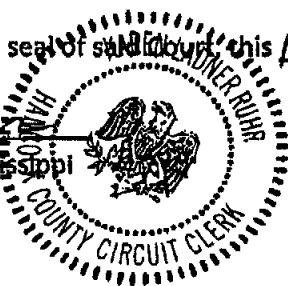
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE
IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to Douglas Handshoe, the attorney for the Plaintiff(s), whose post office address is 214 Corinth Drive, Bay St Louis, MS 39520 and whose street address is 214 Corinth Drive, Bay St Louis, MS 39520. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

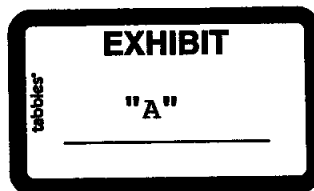
You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 17th day of May, 2013.

Karen L. Ruhl
Clerk of Hancock County, Mississippi
K. Lou D.C.



(Seal)



State of Mississippi
County of Hancock

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server Signature

Sworn to and subscribed before me this the _____ day of _____ 2013 .

Notary Public

(Seal)

My Commission Expires _____

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI
SECOND JUDICIAL DISTRICT

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NUMBER

13-0174

JOHN DOE(S) AKA "RANDALL CAJUN"

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI

TO: Charles Leary
189 Trout Point Road
East Kemptville, NS BOW 1Y0, Canada

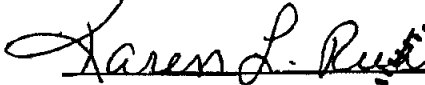
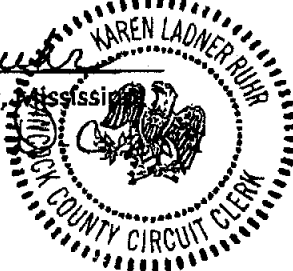
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You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 17th day of May, 2013.


Clerk of Hancock County, Mississippi
By: K. Con 

(Seal)

State of Mississippi
County of Hancock

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server Signature

Sworn to and subscribed before me this the _____ day of _____ 2013 .

Notary Public

(Seal)

My Commission Expires _____

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SECOND JUDICIAL DISTRICT

FILED

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

MAY 17 2013

CIVIL ACTION NUMBER 3-0174

JOHN DOE(S) AKA "RANDALL CAJUN"

KAREN LADNER RUHR
CIRCUIT CLERK, HANCOCK CO.
BY A. Con D.C.

DEFENDANT

COMPLAINT FOR PRE PETITION DISCOVERY

Comes now Plaintiff Douglas Handshoe under rule 26 Mississippi Civil Procedure, and files this complaint against John Doe(s) known as Randall Cajun and in support shows the following:

1. Plaintiff is a Mississippi resident and owner of Slabbed New Media, LLC, which resides in and publishes the investigative weblog Slabbed in the Second Judicial District.
2. Anticipated defendant, John Doe(s) aka Randall Cajun, is a person whose identity is presently unknown to the Plaintiff, but who will be named as a defendant in a civil action for defamation against Plaintiff when his (their) identities are discovered.
3. Jurisdiction and venue are proper under section 13-3-57 Mississippi Code Annotated (1972). Plaintiff, upon knowledge and belief, anticipates defendant(s) are residents of another state or foreign country.

FACTUAL ALLEGATIONS – INTRODUCTION

4. Starting on January 6, 2013, an anonymous person(s), writing under the internet handle "Randall Cajun" has posted a series of defamatory blog posts about plaintiff and others individuals that comment on Plaintiff's website on the blog "Real-Malice" which can be found at www.real-malice.blogspot.ca.
5. Plaintiff does not know Randall Cajun's true identity with certainty and therefore cannot serve a civil complaint on him at this time. But the evidence discussed herein strongly indicates Randall Cajun is one or more of the owners of Trout Point Lodge in Canada posting from Canada and upon knowledge and belief New Orleans Louisiana.¹

¹ Trout Point Lodge filed numerous Strategic Lawsuits against Public Participation (SLAPP suits) from Nova Scotia Canada against several Metro New Orleans media outlets including the Times Picayune, Louisiana Media Company (Fox 8) and plaintiff in a practice known as libel tourism. Slabbed New Media, publishing court documents from the lawsuit filed by the Lodge and two of its owners against Fox 8 in Yarmouth Nova Scotia revealed what prosecutors from the United States would later term evidence of other crimes under FRE Rule 404b. After publication of these court documents, plaintiff was contacted by agents of the Federal Bureau of Investigation seeking additional information obtained by Slabbed New Media from the Fox 8 case filed in Canada. The Lodge is owned by several

6. On January 10, 2013, Randall Cajun commented on the New Orleans based investigative blog The American Zombie post "A Pet Peeve" attached as Exhibit A.
7. The blog moderator, Jason Berry, well aware of the multiple frivolous SLAPP suits filed by Aaron Broussard's cronies on his behalf from Canada publicly posted Randall Cajun's IP address in a follow up post "See...this is how it works". Mr. Berry revealed Randall Cajun was posting from a Nova Scotia Internet service provider consistent with the area of Nova Scotia where the Lodge is located. It is attached as Exhibit B.
8. On February 4, 2013 Randall Cajun posted "Handshoe, Goodson, Bankston, Vandenweghe, Lauricella: maybe Handshoe has been projecting his own life experiences onto others". It is attached as Exhibit C. It is replete with implications Plaintiff was target of a major 1990s criminal investigation in a personal capacity complete "with family links to the mafia". These statements are defamatory per se.²
9. On February 10, 2013, in response to my answer to reader inquiries about Randall Cajun's post of February 4, 2013, Randall Cajun posted "Douglas K. Handshoe: Liquidating assets". It is attached as Exhibit D. The post contains several factual inaccuracies including the misstatement of the date plaintiff "joined Slidell Motel" in an effort to paint plaintiff as a member of an organized crime conspiracy.
10. On March 31, 2013 Randall Cajun posted "Good 'n Handy: Doug Handshoe, Coverup & Fred Goodson". It is attached as Exhibit E. In this post Randall Cajun terms Plaintiff an "avowed anti-gay blogger", which is patently false. Additionally, Randall Cajun again posted I was an officer of companies prior to the criminal prosecution referred to in paragraphs 8 and 9 above. This misstatement of the date that I joined the subject company an officer is a clear attempt to impart, via false assertions, that Plaintiff was a member of a corrupt organization.³
11. Randall Cajun has defamed other commenters on the Slabbed New Media website including Anne Marie Vandenweghe and Kevin LaMaire, currently residents of the State of Louisiana. Ms Vandenweghe is widely credited with being the whistleblower that triggered the prosecution of former Jefferson Parish President Aaron Broussard. LaMaire, a respected paralegal, is a

local businessmen that were politically connected to Aaron Broussard, himself currently serving a 46 month sentence at the Federal Correctional Complex in Butner North Carolina.

² Plaintiff performed litigation support services for one of the defendants to the prosecution and later agreed to assist the United States Attorney and US Marshall's service in disposing of assets forfeited as a result of the prosecution including acting as "liquidating agent" for the United States in a related bankruptcy case. Such was the respect earned by the plaintiff in this matter that he ended up performing professional services as a Certified Public Accountant for the defense and then later the prosecution.

³ Plaintiff became an officer of the entity in question to facilitate its sale to satisfy an order of Forfeiture issued by the United States District Court for the Eastern District of Louisiana. This complex of criminal cases and appeals, colloquially known as USA v Cleveland and Cleveland v USA was ultimately decided by the United States Supreme Court largely but not completely in favor of the defendants. See *Cleveland v. United States*, 531 U.S. 12 (2000). The United States Supreme Court ruling in this case can be found online via justia at <http://supreme.justia.com/cases/federal/us/531/12/case.html>

knowledgeable source on the Louisiana class action legal community due to his previous association with Calvin "Calhoun" Fayard, one of a group of lawyers that comprised "The Castano Group". This joint venture sued the tobacco companies in the late 1990s. Certain of these lawyers would go on to sue the gun manufacturers.⁴

12. In addition to the many false and defamatory statements made about Plaintiff, it appears Randall Cajun possesses a level of knowledge about the social calendar of Aaron Broussard and details of the Lodge's many legal battles that is well beyond what is expected of even the most diligent outside observer.

ANTICIPATED CAUSES OF ACTION

COUNT 1: DEFAMATION

13. Plaintiff hereby incorporates and realleges all of the allegations in paragraphs 1 through 12 of this petition.
14. By publishing these posts to a public website www.real-malice.ca and promoting their existence in the local blogosphere defendant published or caused to be published statements to numerous third parties.
15. The posts, especially those referenced in paragraphs 8 through 10 in this complaint above were and remain false, defamatory and libelous published with reckless disregard for the truth in keeping with the name of the weblog.
16. The posts, especially those referenced in paragraphs 8 through 10 in this complaint contain statements of fact, not opinion, that plaintiff has engaged in dishonest, unethical and illegal conduct and are defamatory per se.
17. The posts, especially those referenced in paragraphs 8 through 10 in this complaint were and remain of a character that would tend to harm Plaintiff's reputation, lowered his status in the eyes of his community and clientele deterring others from associating and dealing with him and have otherwise exposed him to contempt.
18. As a proximate cause of the defendant's publication of the defamatory statements listed in paragraphs 8 through 10 of this complaint Plaintiff has suffered loss to his trade, business and reputation.

PRE-SUIT DISCOVERY SOUGHT

⁴ Indeed Trout Point Lodge owner Daniel G. "Danny" Abel, who practiced at the law firm of Aaron Broussard and Danny Abel Attorneys at law located in Suite 106 of the Super 8 Motel on Clearview Parkway, Metairie Louisiana wrote a book about his experiences suing the gun manufacturers in "Outgunned: Up Against the NRA--The First Complete Insider Account of the Battle Over Gun Control".

In order to discover and confirm Randall Cajun's identity in order to file suit for defamation plaintiff seeks the following:

19. A court order compelling Google, Inc., owner of blogger.com, web host for Real-Malice.blogspot.ca to reveal the IP addresses of all contributors to the weblog.
20. Issue a subsequent court order(s) to the internet service providers used by Randall Cajun to post the defamatory content in order to ascertain his identity to properly file suit.
21. Issue subpoenas as appropriate in the circumstances.

WHEREFORE plaintiff prays this honorable court would issue subpoenas and enter court orders as described in Paragraphs 19-21 above for the purposes described above in this complaint.

Respectfully submitted this 17th day of May, 2013.



Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
Phone: (228) 284-0004
Facsimile: (601) 928-5129
earning04@gmail.com

Appearing Pro Se

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DEFENDANT

RULE TO SHOW CAUSE

Considering the foregoing Complaint for Pre Petition Discovery pursuant to Rule 26, MRCP;

IT IS ORDERED the plaintiff, Douglas Handshoe, show cause on _____ day of _____, 2013 at
____:____.m why this court should grant plaintiff pre petition discovery.

Bay St Louis, Mississippi this _____ day of _____ 2013.

JUDGE